

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

**WATSON GRINDING &
MANUFACTURING CO.,**

Debtor.

§
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§
§
§
§

Chapter 11

Case No. 20-30967

**LIQUIDATING TRUSTEE'S OMNIBUS OBJECTION TO DUPLICATE LITIGATION
PROOFS OF CLAIM**

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THIS BANKRUPTCY CASE. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED WITHOUT A HEARING.

THIS OBJECTION SEEKS TO DISALLOW CERTAIN PROOFS OF CLAIM. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON SCHEDULE 1 ATTACHED TO THIS OBJECTION.

**To the Honorable Marvin Isgur,
United States Bankruptcy Judge:**

Ronald Bankston, in his capacity as the Liquidating Trustee (the "Liquidating Trustee") of the Liquidating Trust for the estate of Watson Grinding & Manufacturing Co. ("WGM"), files this *Omnibus Objection to Duplicate Litigation Proofs of Claim* (the "Objection") pursuant to sections 105(a) and 502(b) of title 11 of the United States Code §§ 101-1532 (the "Bankruptcy Code"), Rule 3007(d)(1) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 3007-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "Bankruptcy Local Rules").

SUMMARY OF OBJECTION

1. The Liquidating Trustee objects to certain proofs of claims as duplicative of claims asserted in pending state court litigation which were deemed filed proofs of claim by a

previous Court order (the “Duplicate Claims”). The Liquidating Trustee seeks entry of an order disallowing the Duplicate Claims identified on Schedule 1 attached hereto because each such claim is asserted by a party who has filed suit against WGM in state court and its claim will be liquidated as part of the state court litigation process rather than the claims adjudication process before this Court. The Liquidating Trustee seeks entry of this order without prejudice to any party’s claims against WGM in the underlying litigation in state court.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This Objection is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested in this objection are sections 105(a) and 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007(d)(1), and Bankruptcy Local Rule 3007-1.

LEGAL AUTHORITY

4. Section 502 of the Bankruptcy Code deems the allowance of a claim or interest, proof of which is filed under section 501 of the Bankruptcy Code “unless a party in interest . . . objects.” 11 U.S.C. § 502. Bankruptcy Rule 3007 provides certain grounds upon which “objections to more than one claim may be joined in an omnibus objection,” which includes objections to claims that “duplicate other claims.” FED. R. BANKR. P. 3007(d)(1).

5. Bankruptcy Rule 3001(f) provides that “[a] proof of claim executed and filed in accordance with [the Bankruptcy Rules] shall constitute prima facie evidence of the validity and amount of the claim.” *See, e.g., In re Jack Kline Co., Inc.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). A proof of claim loses the presumption under Bankruptcy Rule 3001(f) when an objecting party refutes at least one allegation that is essential to the claim’s legal sufficiency. *See In re*

Fidelity Holding Co., Ltd., 837 F.2d 696, 698 (5th Cir. 1988). The burden then shifts to the claimant to prove the validity of its claim by a preponderance of the evidence. *Id.* Thus, even with the burden shifting framework, “the ultimate burden of proof always lies with the claimant.” *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep’t of Rev.*, 530 U.S. 15 (2000)).

6. Pursuant to Bankruptcy Local Rule 3007-1(b) “[a]n objection to claim may be filed without a hearing date.”

FACTUAL BACKGROUND

7. On February 6, 2020, WGM filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Court”).

8. On May 28, 2020, the Court entered the Order Recognizing Pending Litigation Complaints as Proofs of Claim (Doc. No. 310). This order provides, in pertinent part:

- a. The Debtor shall recognize the claims asserted in a petition or complaint filed by any party who is a plaintiff in a lawsuit filed against the Debtors as of July 8, 2020, as a timely filed proof of claim asserting an unliquidated, general unsecured claim.
- b. Any such party shall not be required to file a formal proof of claim in order to preserve its claims against the estate.
- c. These informal proofs of claim shall be deemed objected to upon the filing of an answer or motion to dismiss the petition or complaint in the respective lawsuit, and shall not be deemed an allowed claim until the claim is either settled or liquidated to a final judgment in any court of competent jurisdiction.

9. Notwithstanding this Order, a significant number of plaintiffs in the state court lawsuits filed proofs of claim against WGM. Attached hereto as Schedule 1 is a list of all Duplicate Claims filed by plaintiffs identified by (i) dated filed, (ii) proof of claim number, (iii)

adversary proceeding in which the claim was originally asserted, (iv) name of the claimant, (v) amount of the claim, and (vi) the plaintiff's lawyer.

10. On December 30, 2020, the Court entered an order confirming the *First Amended Combined Disclosure Statement and Joint Plan of Liquidation of Watson Grinding & Manufacturing Co. and Watson Valve Services, Inc. Under Chapter 11 of the Bankruptcy Code Filed by the January 24 Claimants Committee* (the "Plan") [Doc. No. 971].

11. Pursuant to Article XVII of the Plan, "the Bankruptcy Court shall have no jurisdiction to allow, disallow, determinate, liquidate, classify, estimate or establish the propriety, Secured or Unsecured status, or amount of any January 24 Claim that is asserted in one of the Removed Lawsuits, even if such Claimant also filed a proof of claim based on the Removed Lawsuit."

12. Pursuant to Article XIV of the Plan, the Liquidating Trustee has standing to object to January 24 Claims.

13. The Duplicate Claims are January 24 Claims based on Removed Lawsuits for which a proof of claim was also filed.

CLAIMS AND OBJECTION

14. The Liquidating Trustee objects to each claim listed in **Schedule 1** as a "Duplicate Claim" because they are duplicative of the claims asserted in the Removed Lawsuits (as defined in the Plan) listed in Schedule 1 and which were deemed filed claims pursuant to an earlier court order (Doc. No. 310).

15. The Plan specifically and unequivocally divests the Bankruptcy Court over jurisdiction of the Removed Lawsuits in favor of remanding those cases to an MDL panel in state court even where a plaintiff also filed a proof of claim.

16. This relief will not prejudice the Duplicate Claimants. All of the claims asserted in the Duplicate Claims will be adjudicated and liquidated in the state court MDL proceeding as provided for in the Plan. Nothing in this objection shall be construed as an objection to the amount or merits of any Duplicate Claim.

17. This objection is supported by the *Declaration of Ronald G. Bankston in Support of the Liquidating Trustee's Omnibus Objection to Duplicate Litigation Proofs of Claim* (the "Bankston Declaration"), attached hereto as **Exhibit A**.

18. Accordingly, the Liquidating Trustee requests that the Duplicate Claims in **Schedule 1** be disallowed in their entirety without prejudice to the Claimants' claims asserted in the remanded state court cases.

SEPARATE CONTESTED MATTER

19. To the extent that a response is filed regarding any Duplicate Claim and the Liquidating Trustee is not able to resolve any such response, each Duplicate Claim, and the Objection as it pertains to such Duplicate Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Further, the Liquidating Trustee requests that any order entered by the Court regarding an objection or other reply asserted in response to this Objection be deemed a separate order with respect to each proof of claim.

CONCLUSION

WHEREFORE, the Liquidating Trustee respectfully requests that this Court grant the Liquidating Trustee's Objection as set forth above, and grant relief to which the Liquidating Trustee may be justly entitled.

Dated: March 5, 2021.

Respectfully submitted by:

PORTER HEDGES, LLP

/s/ Aaron J. Power

Joshua W. Wolfshohl

State Bar No. 24038592

Aaron J. Power

State Bar No. 24058058

1000 Main Street, 36th Floor

Houston, Texas 77002

Telephone: (713) 226-6000

Facsimile: (713) 226-6248

Counsel for the Liquidating Trustee

CERTIFICATE OF SERVICE

I certify that on March 5, 2021, I caused a copy of the foregoing document to be served by email to all counsel listed on Schedule 1 and by the Electronic Case Filing System to all parties appearing in these cases.

/s/ Aaron J. Power
Aaron J. Power

CERTIFICATE OF CONFERENCE

I certify that on February 26, 2021, I sent a draft of this objection and the proposed order to all counsel who are listed on Schedule 1 with a request for comments by no later than March 4, 2021. No responses were received prior to filing this objection.

/s/ Aaron J. Power
Aaron J. Power

SCHEDULE 1

Date Filed	POC No.	Adv. Pro. No.	Claimant	POC Amount	Attorney Name
3/10/2020	11	20-03326	Essentia Insurance Company, as subrogee of William Usher	\$32,890.81	Mark A. Solomon
3/10/2020	12	20-03326	Essentia Insurance Company, as subrogee of Ressler	\$17,300.00	Mark A. Solomon
3/10/2020	13	20-03326	Essentia Insurance Company, as subrogee of Kamins	\$32,609.27	Mark A. Solomon
3/10/2020	14	20-03326	Essentia Insurance Company, as subrogee of Rossman	\$23,814.32	Mark A. Solomon
3/10/2020	15	20-03326	Essentia Insurance Company, as subrogee of Keckeisen	\$26,287.44	Mark A. Solomon
3/13/2020	16	20-03326	Southern Vanguard Insurance No, subrogee of Gutierrez	\$10,209.65	Mark A. Solomon
3/23/2020	17	20-03326	Southern Vanguard Insurance No, subrogee of Morales	\$5,384.02	Mark A. Solomon
3/23/2020	18	20-03326	Southern Vanguard Insurance No, subrogee of Milner	\$82,038.74	Mark A. Solomon
3/23/2020	19	20-03326	Southern Vanguard Insurance No, subrogee of Uriostegui	\$108,014.00	Mark A. Solomon
3/23/2020	20	20-03326	Southern Vanguard Insurance No, subrogee of Tiende	\$9,761.45	Mark A. Solomon
3/23/2020	21	20-03326	Southern Vanguard Insurance No, subrogee of Ortiz	\$23,515.23	Mark A. Solomon
3/23/2020	22	20-03326	Southern Vanguard Insurance No, subrogee of Vargas	\$9,575.53	Mark A. Solomon
3/23/2020	23	20-03326	Southern Vanguard Insurance No, subrogee of Wallingsford	\$6,554.38	Mark A. Solomon
3/23/2020	24	20-03326	Southern Vanguard Insurance No, subrogee of Thurman	\$12,203.63	Mark A. Solomon
3/23/2020	25	20-03326	Southern Vanguard Insurance No, subrogee of Aguilar	\$25,477.68	Mark A. Solomon

SCHEDULE 1

Date Filed	POC No.	Adv. Pro. No.	Claimant	POC Amount	Attorney Name
3/23/2020	26	20-03326	Southern Vanguard Insurance No, subrogee of Cole	\$10,604.87	Mark A. Solomon
3/23/2020	27	20-03326	Southern Vanguard Insurance No, subrogee of Robles	\$4,471.47	Mark A. Solomon
3/23/2020	28	20-03326	Southern Vanguard Insurance No, subrogee of Shin	\$7,739.75	Mark A. Solomon
3/23/2020	29	20-03326	Southern Vanguard Insurance No, subrogee of Juarez	\$42,157.66	Mark A. Solomon
4/13/2020	40	20-03168	S&I Realty, LLC	\$717,282.23	Kevin Madden
5/8/2020	48	20-03337	Cypress Texas Insurance Company	\$41,957.53	Trenton Leigh
6/17/2020	62	20-3375	Charlene Greco	Unliquidated	Rob Kwok
6/24/2020	69	20-03376	Michael Jeffcoat	Unliquidated	Matthew R. Willis
6/24/2020	70	20-03376	Leslie Hall	Unliquidated	Matthew R. Willis
6/24/2020	71	20-03376	Miguel Moreno	Unliquidated	Matthew R. Willis
6/24/2020	72	20-03376	Linda Garcia	Unliquidated	Matthew R. Willis
6/24/2020	73	20-03376	Lenetta Webbert	Unliquidated	Matthew R. Willis
6/24/2020	74	20-03376	Josiah Anderson	Unliquidated	Matthew R. Willis
6/24/2020	75	20-03376	Maria Alas	Unliquidated	Matthew R. Willis
6/24/2020	76	20-03376	Maria Olivo	Unliquidated	Matthew R. Willis
6/24/2020	77	20-03376	Joseph Wells	Unliquidated	Matthew R. Willis
6/24/2020	78	20-03376	Joshua Tibbs	Unliquidated	Matthew R. Willis
6/24/2020	79	20-03376	Ray Riley	Unliquidated	Matthew R. Willis
6/24/2020	80	20-03376	Rita Rivera	Unliquidated	Matthew R. Willis
6/24/2020	81	20-03376	Rolando Morales	Unliquidated	Matthew R. Willis
6/24/2020	82	20-03376	Mark Allen	Unliquidated	Matthew R. Willis
6/24/2020	83	20-03376	Adam Alani	Unliquidated	Matthew R. Willis
6/24/2020	84	20-03376	Tara Carter	Unliquidated	Matthew R. Willis
6/24/2020	85	20-03376	Temika Webbert	Unliquidated	Matthew R. Willis
6/24/2020	86	20-03376	Jose Vasquez	Unliquidated	Matthew R. Willis
6/24/2020	87	20-03376	Tricia Berry	Unliquidated	Matthew R. Willis
6/24/2020	88	20-03376	Vicente Cardoso	Unliquidated	Matthew R. Willis
6/24/2020	89	20-03376	Valeriano Mendoza	Unliquidated	Matthew R. Willis
6/24/2020	90	20-03376	Alejandro Moreno	Unliquidated	Matthew R. Willis

SCHEDULE 1

Date Filed	POC No.	Adv. Pro. No.	Claimant	POC Amount	Attorney Name
6/24/2020	91	20-03376	Alexander Lee	Unliquidated	Matthew R. Willis
6/24/2020	92	20-03376	Anna Castro	Unliquidated	Matthew R. Willis
6/24/2020	93	20-03376	Valeriano Mendoza	Unliquidated	Matthew R. Willis
6/24/2020	94	20-03376	Jasmine Moreno	Unliquidated	Matthew R. Willis
6/24/2020	95	20-03376	Veronica Garcia	Unliquidated	Matthew R. Willis
6/24/2020	96	20-03376	Erica Moreno	Unliquidated	Matthew R. Willis
6/24/2020	97	20-03376	Eunice Quill	Unliquidated	Matthew R. Willis
6/24/2020	98	20-03376	Salvador Morales	Unliquidated	Matthew R. Willis
6/24/2020	99	20-03376	Johnathan Olivo	Unliquidated	Matthew R. Willis
6/24/2020	100	20-03376	Rebecca Moreno	Unliquidated	Matthew R. Willis
6/24/2020	101	20-03376	Jose Sanchez	Unliquidated	Matthew R. Willis
6/24/2020	102	20-03376	Ronnie Ellis	Unliquidated	Matthew R. Willis
6/24/2020	103	20-03376	Nadia Slack	Unliquidated	Matthew R. Willis
6/24/2020	104	20-03376	Reda Choukair	Unliquidated	Matthew R. Willis
6/24/2020	105	20-03376	Ricardo Sutton	Unliquidated	Matthew R. Willis
6/24/2020	106	20-03376	John Andersen	Unliquidated	Matthew R. Willis
6/24/2020	107	20-03376	Mike Ayers	Unliquidated	Matthew R. Willis
6/24/2020	108	20-03376	Christopher Olivo	Unliquidated	Matthew R. Willis
6/24/2020	109	20-03376	Da'Aron Harmon	Unliquidated	Matthew R. Willis
6/24/2020	110	20-03376	Fernando Arias	Unliquidated	Matthew R. Willis
6/24/2020	111	20-03376	Daphne Griffin	Unliquidated	Matthew R. Willis
6/24/2020	112	20-03376	Dale Singleton	Unliquidated	Matthew R. Willis
6/24/2020	113	20-03376	Daphne Griffin	Unliquidated	Matthew R. Willis
6/24/2020	114	20-03376	Dellia Hall	Unliquidated	Matthew R. Willis
6/24/2020	115	20-03376	Dwanae Jorden	Unliquidated	Matthew R. Willis
6/24/2020	116	20-03376	Eduardo Ocen	Unliquidated	Matthew R. Willis
6/24/2020	117	20-03376	Johnathan Galvan	Unliquidated	Matthew R. Willis
6/24/2020	118	20-03376	Larry Seligmann	Unliquidated	Matthew R. Willis
6/24/2020	119	20-03376	Michael Berry	Unliquidated	Matthew R. Willis
6/24/2020	120	20-03376	Martin Garcia	Unliquidated	Matthew R. Willis
6/24/2020	121	20-03376	Stefanie Young	Unliquidated	Matthew R. Willis
6/24/2020	122	20-03376	Fay Hall	Unliquidated	Matthew R. Willis
6/24/2020	123	20-03376	Emmalina Martinez	Unliquidated	Matthew R. Willis
6/24/2020	124	20-03376	Eunice Quill	Unliquidated	Matthew R. Willis

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Date Filed	POC No.	Adv. Pro. No.	Claimant	POC Amount	Attorney Name
6/24/2020	125	20-03376	Fay Hall	Unliquidated	Matthew R. Willis
6/24/2020	126	20-03376	Jaclyn Williams	Unliquidated	Matthew R. Willis
6/24/2020	127	20-03376	Herbert Maduro	Unliquidated	Matthew R. Willis
6/24/2020	128	20-03376	Johnyce Adams	Unliquidated	Matthew R. Willis
6/24/2020	129	20-03376	Reda Choukair	Unliquidated	Matthew R. Willis
6/24/2020	130	20-03376	Mike Ayers	Unliquidated	Matthew R. Willis
6/24/2020	131	20-03376	Nadia Slack	Unliquidated	Matthew R. Willis
6/24/2020	132	20-03376	Veronica Garcia	Unliquidated	Matthew R. Willis
6/24/2020	133	20-03376	Vicente Cardoso	Unliquidated	Matthew R. Willis
6/24/2020	135	20-03376	Ronnie Ellis	Unliquidated	Matthew R. Willis
6/24/2020	136	20-03376	Salvador Morales	Unliquidated	Matthew R. Willis
6/24/2020	137	20-03376	Ricardo Sutton	Unliquidated	Matthew R. Willis
6/24/2020	138	20-03376	Miguel Moreno	Unliquidated	Matthew R. Willis
6/24/2020	140	20-03376	Alexander Lee	Unliquidated	Matthew R. Willis
6/24/2020	141	20-03376	Michael Jeffcoat	Unliquidated	Matthew R. Willis
6/24/2020	142	20-03376	Michael Jeffcoat	Unliquidated	Matthew R. Willis
6/24/2020	143	20-03376	Alejandro Moreno	Unliquidated	Matthew R. Willis
6/24/2020	144	20-03376	Alexander Lee	Unliquidated	Matthew R. Willis
6/24/2020	145	20-03376	Fernando Arias	Unliquidated	Matthew R. Willis
6/24/2020	146	20-03376	Francisco Olivo	Unliquidated	Matthew R. Willis
6/24/2020	147	20-03376	Herbert Maduro	Unliquidated	Matthew R. Willis
6/24/2020	148	20-03376	John Andersen	Unliquidated	Matthew R. Willis
6/24/2020	149	20-03376	Johnathan Galvan	Unliquidated	Matthew R. Willis
6/24/2020	150	20-03376	Joseph Wells	Unliquidated	Matthew R. Willis
6/24/2020	151	20-03376	Johnathan Olivo	Unliquidated	Matthew R. Willis
6/24/2020	152	20-03376	Eric Morales	Unliquidated	Matthew R. Willis
6/24/2020	153	20-03376	Josiah Anderson	Unliquidated	Matthew R. Willis
6/24/2020	154	20-03376	Herbert Maduro	Unliquidated	Matthew R. Willis
6/24/2020	155	20-03376	Jaclyn Williams	Unliquidated	Matthew R. Willis
6/24/2020	156	20-03376	Larry Seligmann	Unliquidated	Matthew R. Willis
6/24/2020	157	20-03376	Lenetta Webbert	Unliquidated	Matthew R. Willis
6/24/2020	158	20-03376	Leslie Hall	Unliquidated	Matthew R. Willis
6/24/2020	159	20-03376	Linda Garcia	Unliquidated	Matthew R. Willis
6/24/2020	160	20-03376	Maria Alas	Unliquidated	Matthew R. Willis

SCHEDULE 1

Date Filed	POC No.	Adv. Pro. No.	Claimant	POC Amount	Attorney Name
6/24/2020	161	20-03376	Maria Olivo	Unliquidated	Matthew R. Willis
6/24/2020	162	20-03376	Mark Allen	Unliquidated	Matthew R. Willis
6/24/2020	163	20-03376	Martin Garcia	Unliquidated	Matthew R. Willis
6/24/2020	164	20-03376	Michael Berry	Unliquidated	Matthew R. Willis
6/24/2020	165	20-03376	Eric Quill	Unliquidated	Matthew R. Willis
6/24/2020	166	20-03376	Johnyce Adams	Unliquidated	Matthew R. Willis
6/24/2020	167	20-03376	Francisco Olivo	Unliquidated	Matthew R. Willis
6/24/2020	168	20-03376	Herbert Maduro	Unliquidated	Matthew R. Willis
6/24/2020	169	20-03376	Erica Moreno	Unliquidated	Matthew R. Willis
6/24/2020	170	20-03376	Eric Quill	Unliquidated	Matthew R. Willis
6/24/2020	171	20-03376	Erica Moreno	Unliquidated	Matthew R. Willis
6/24/2020	172	20-03376	Stefanie Young	Unliquidated	Matthew R. Willis
6/24/2020	173	20-03376	Tara Carter	Unliquidated	Matthew R. Willis
6/24/2020	174	20-03376	Temika Webbert	Unliquidated	Matthew R. Willis
6/24/2020	175	20-03376	Tricia Berry	Unliquidated	Matthew R. Willis
6/24/2020	176	20-03376	Jose Sanchez	Unliquidated	Matthew R. Willis
6/24/2020	177	20-03376	Eduardo Ocen	Unliquidated	Matthew R. Willis
6/24/2020	178	20-03376	Emmalina Martinez	Unliquidated	Matthew R. Willis
6/24/2020	179	20-03376	Dellia Hall	Unliquidated	Matthew R. Willis
6/24/2020	180	20-03376	Dwanae Jorden	Unliquidated	Matthew R. Willis
6/24/2020	181	20-03376	Dale Singleton	Unliquidated	Matthew R. Willis
6/24/2020	182	20-03376	Christopher Olivo	Unliquidated	Matthew R. Willis
6/24/2020	183	20-03376	Da'Aron Harmon	Unliquidated	Matthew R. Willis
6/29/2020	190	20-03360	AMICA MUTUAL INSURANCE COMPANY	\$294,463.30	Dean Pappas; Frank Vlahakos
6/29/2020	192	20-03369	Ana Moss	\$130,000.00	Eric Dick
7/1/2020	205	20-03383	Maria Blanco	Unliquidated	Anthony Buzbee
7/1/2020	206	20-03383	Maria Blanco	Unliquidated	Anthony Buzbee
7/1/2020	207	20-03383	Cathryn R. Bottoms	Unliquidated	Anthony Buzbee
7/1/2020	208	20-03383	Joe Brunson	Unliquidated	Anthony Buzbee
7/1/2020	209	20-03383	Susie Brunson as next friend of Bylan B.	Unliquidated	Anthony Buzbee
7/1/2020	210	20-03383	Susie Brunson, Individually	Unliquidated	Anthony Buzbee
7/1/2020	211	20-03383	Sara G. Darrow	Unliquidated	Anthony Buzbee

SCHEDULE 1

Date Filed	POC No.	Adv. Pro. No.	Claimant	POC Amount	Attorney Name
7/1/2020	212	20-03383	John DaSilva	Unliquidated	Anthony Buzbee
7/1/2020	213	20-03383	Kay DaSilva	Unliquidated	Anthony Buzbee
7/1/2020	214	20-03383	Tasha Felder, Individually and on Behalf	Unliquidated	Anthony Buzbee
7/1/2020	215	20-03383	Johnnie Huynh	Unliquidated	Anthony Buzbee
7/1/2020	216	20-03383	Henry Lindsay	Unliquidated	Anthony Buzbee
7/1/2020	217	20-03383	Sophie Lindsay	Unliquidated	Anthony Buzbee
7/1/2020	218	20-03383	Kelly Mallady	Unliquidated	Anthony Buzbee
7/1/2020	219	20-03383	Ana Luisa Singu	Unliquidated	Anthony Buzbee
7/2/2020	227	20-03383	Amado Anguiano	Unliquidated	Anthony Buzbee
7/2/2020	228	20-03383	Tasha Felder, Individually and on Behalf	Unliquidated	Anthony Buzbee
7/2/2020	229	20-03383	Tasha Felder, Individually and on Behalf	Unliquidated	Anthony Buzbee
7/2/2020	230	20-03383	Yoloanda Navarro	Unliquidated	Anthony Buzbee
7/2/2020	231	20-03383	Erick Anaya	Unliquidated	Anthony Buzbee
7/2/2020	232	20-03383	Victoria Chavez	Unliquidated	Anthony Buzbee
7/2/2020	233	20-03383	Paola Chazarreta	Unliquidated	Anthony Buzbee
7/2/2020	234	20-03383	Paola G. Chazarreta	Unliquidated	Anthony Buzbee
7/2/2020	235	20-03383	Jose D. Coreas	Unliquidated	Anthony Buzbee
7/2/2020	236	20-03383	Jorge Garcia	Unliquidated	Anthony Buzbee
7/2/2020	237	20-03383	Donald Holcomb	Unliquidated	Anthony Buzbee
7/2/2020	238	20-03383	Ken Holland, Individually and on behalf	Unliquidated	Anthony Buzbee
7/2/2020	239	20-03383	Ken Holland, Individually and on behalf	Unliquidated	Anthony Buzbee
7/2/2020	240	20-03383	Byron Keith House	Unliquidated	Anthony Buzbee
7/2/2020	241	20-03383	Odess Marie James House	Unliquidated	Anthony Buzbee
7/2/2020	258	20-03383	Elaine Jackson	Unliquidated	Anthony Buzbee
7/2/2020	259	20-03383	Jair Leal	Unliquidated	Anthony Buzbee
7/2/2020	260	20-03383	Leonard Lebo o/b/o Pinemont Properties,	Unliquidated	Anthony Buzbee
7/2/2020	261	20-03383	Nelly Zelaya	Unliquidated	Anthony Buzbee
7/2/2020	262	20-03383	Anthony Uriostegui	Unliquidated	Anthony Buzbee

SCHEDULE 1

Date Filed	POC No.	Adv. Pro. No.	Claimant	POC Amount	Attorney Name
7/2/2020	263	20-03383	Tina Tran	Unliquidated	Anthony Buzbee
7/2/2020	264	20-03383	Reyna Malerva Torres	Unliquidated	Anthony Buzbee
7/2/2020	265	20-03383	Hossein Sondjani	Unliquidated	Anthony Buzbee
7/2/2020	266	20-03383	Oanh Nguyen	Unliquidated	Anthony Buzbee
7/2/2020	267	20-03383	Joy Sessions	Unliquidated	Anthony Buzbee
7/2/2020	268	20-03383	Joy Sessions o/b/o Jaylyn Sessions	Unliquidated	Anthony Buzbee
7/2/2020	269	20-03383	Mijah Sessions	Unliquidated	Anthony Buzbee
7/2/2020	270	20-03383	Jasiah Sessions	Unliquidated	Anthony Buzbee
7/2/2020	271	20-03383	Maria Battiste	Unliquidated	Anthony Buzbee
7/2/2020	272	20-03383	Dale C. Battiste	Unliquidated	Anthony Buzbee
7/2/2020	273	20-03383	Deborah Patten	Unliquidated	Anthony Buzbee
7/2/2020	274	20-03383	Delta Hernandez	Unliquidated	Anthony Buzbee
7/2/2020	275	20-03383	Esperanza Tabares	Unliquidated	Anthony Buzbee
7/2/2020	276	20-03383	Ethan Decicco	Unliquidated	Anthony Buzbee
7/7/2020	280	20-03383	Greg Malloch	Unliquidated	Anthony Buzbee
7/7/2020	281	20-03383	Isabel Campoverde	Unliquidated	Anthony Buzbee
7/7/2020	282	20-03383	Fredregille, James B	Unliquidated	Anthony Buzbee
7/7/2020	283	20-03383	James Walker	Unliquidated	Anthony Buzbee
7/7/2020	284	20-03383	Jorge Castillo	Unliquidated	Anthony Buzbee
7/7/2020	285	20-03383	Kasi Kirby	Unliquidated	Anthony Buzbee
7/7/2020	286	20-03383	Juan Reyes	Unliquidated	Anthony Buzbee
7/7/2020	287	20-03383	Kathy Collins	Unliquidated	Anthony Buzbee
7/7/2020	288	20-03383	Nathan Decicco	Unliquidated	Anthony Buzbee
7/7/2020	289	20-03383	Michael Smooke	Unliquidated	Anthony Buzbee
7/7/2020	290	20-03383	Michelle Jimenez	Unliquidated	Anthony Buzbee
7/7/2020	291	20-03383	Normajean Paula Hernandez	Unliquidated	Anthony Buzbee
7/7/2020	292	20-03383	Nestor Javier Gonzalez Velazquez	Unliquidated	Anthony Buzbee
7/7/2020	293	20-03383	Marilyn Cue	Unliquidated	Anthony Buzbee
7/7/2020	294	20-03383	Luis Carreon	Unliquidated	Anthony Buzbee
7/7/2020	295	20-03383	Christina Thurman	Unliquidated	Anthony Buzbee
7/7/2020	296	20-03383	Rodriguez Clementina Izaguirre	Unliquidated	Anthony Buzbee
7/7/2020	297	20-03383	Melissa Walker	Unliquidated	Anthony Buzbee
7/7/2020	298	20-03383	Melissa Walker	Unliquidated	Anthony Buzbee

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Date Filed	POC No.	Adv. Pro. No.	Claimant	POC Amount	Attorney Name
7/7/2020	301	20-03238	Aegis Security Insurance Company	\$43,546.29	Randall Poelma
7/7/2020	302	20-03238	AmGUARD Insurance Company	\$49,511.48	Randall Poelma
7/7/2020	303	20-03238	National Lloyds Insurance Co.	\$94,797.69	Randall Poelma
7/7/2020	306	20-03335	Felipe Revuelta	\$107,660.99	Michael Bins
7/7/2020	307	20-03338	Zee Lee	\$67,213.02	Michael Bins
7/7/2020	308	20-03383	Maria Adela Perez	Unliquidated	Anthony Buzbee
7/7/2020	309	20-03366	Charlene Marthio	Unliquidated	Anthony Buzbee
7/7/2020	310	20-03366	Mark Marthio	Unliquidated	Anthony Buzbee
7/7/2020	311	20-03366	Yasmin Marthio	Unliquidated	Anthony Buzbee
7/7/2020	312	20-03383	James Walker	Unliquidated	Anthony Buzbee
7/7/2020	313	20-03383	Susie Brunson obo Ariana Brunson	Unliquidated	Anthony Buzbee
7/7/2020	314	20-03383	Susie Brunson obo Jack Brunson	Unliquidated	Anthony Buzbee
7/7/2020	315	20-03383	Calixto Lopez	Unliquidated	Anthony Buzbee
7/7/2020	316	20-03383	Chao Gao	Unliquidated	Anthony Buzbee
7/7/2020	317	20-03383	Otilia Arjona	Unliquidated	Anthony Buzbee
7/7/2020	318	20-03383	Pedro Arjona	Unliquidated	Anthony Buzbee
7/7/2020	319	20-03383	Peter Arjona	Unliquidated	Anthony Buzbee
7/7/2020	320	20-03383	Sofia Ferrel	Unliquidated	Anthony Buzbee
7/7/2020	321	20-03383	Arthur Ferrel	Unliquidated	Anthony Buzbee
7/7/2020	322	20-03383	Arthur Ahn Nguyen	Unliquidated	Anthony Buzbee
7/7/2020	323	20-03383	William Walingsford	Unliquidated	Anthony Buzbee
7/7/2020	324	20-03383	Tina Do	Unliquidated	Anthony Buzbee
7/7/2020	325	20-03383	Tan Truong	Unliquidated	Anthony Buzbee
7/7/2020	326	20-03383	Beronica Tabares	Unliquidated	Anthony Buzbee
7/7/2020	327	20-03383	Veronic Jimenez	Unliquidated	Anthony Buzbee
7/7/2020	328	20-03383	Agnex Panong	Unliquidated	Anthony Buzbee
7/8/2020	336	20-03335	Leticia and Valentin Revuelta	\$78,561.97	Michael Bins
7/8/2020	337	20-03341	Toan Ly	\$55,153.23	Michael Bins
7/8/2020	338	20-03340	Jose & Lidia Rodriguez	\$58,681.67	Michael Bins
7/8/2020	339	20-03339	Tony Henry Yu	\$66,526.36	Michael Bins
7/8/2020	342	20-03334	Binh Lu an Quyen Lu	\$70,000.00	Michael Bins
7/8/2020	343	20-03333	Chuyen Tu	\$75,000.00	Michael Bins

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Date Filed	POC No.	Adv. Pro. No.	Claimant	POC Amount	Attorney Name
7/8/2020	344	20-03340	Lidia Rodriguez	\$300,000.00	Michael Bins
7/8/2020	350	20-03082 20-03381	Yesenia Ayala, as Next Fried of I.C. and	Unliquidated	Byron Alfred
7/8/2020	351	20-03383	Ryan Hess	Unliquidated	Anthony Buzbee
7/8/2020	352	20-03383	Alfonso Rodriguez	Unliquidated	Anthony Buzbee
7/8/2020	353	20-03351	Brandi Peck	Unliquidated	Anthony Buzbee
7/8/2020	357	20-03291	Allstate Fire & Casualty Insurance Company	\$29,152.16	Mark Grotefeld; Adam Copack
7/8/2020	358	20-03291	Allstate Indemnity Company	\$13,477.62	Mark Grotefeld; Adam Copack
7/8/2020	359	20-03291	Allstate Texas Lloyds	\$773,992.98	Mark Grotefeld; Adam Copack
7/8/2020	360	20-03291	Allstate Vehicle and Property Insurance Company	\$4,547,311.96	Mark Grotefeld; Adam Copack
7/8/2020	361	20-03291	State Farm Lloyds	\$3,882,923.98	Mark Grotefeld; Adam Copack
7/8/2020	362	20-03291	State Farm Automobile Insurance Co.	\$60,283.82	Mark Grotefeld; Adam Copack
7/8/2020	363	20-03291	Progressive County Mutual Insurance Company	\$27,003.96	Mark Grotefeld; Adam Copack
7/8/2020	364	20-03291	Lighthouse Property Insurance Corporation	\$263,126.35	Mark Grotefeld; Adam Copack
7/8/2020	365	20-03291	Liberty Insurance Corporation	\$294,995.41	Mark Grotefeld;
7/8/2020	366	20-03291	Liberty Lloyds of Texas Insurance Company	\$31,234.79	Mark Grotefeld; Adam Copack
7/8/2020	367	20-03291	Safeco Insurance Company of Indiana	\$66,123.35	Mark Grotefeld; Adam Copack